

FILED

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

) INDICTMENT

Plaintiff,

)

v.

)

HEATH TURNER, CASANDRA RELIK,
ANTWON HOLT, AND KRISTY
STANDEN,

) 1:24 CR 00467

) CASE NO.

Title 18, United States Code,
Sections 922(a)(6), 922(g)(1),
924(a)(2), 924(a)(8), and 2

Defendants.

JUDGE NUGENT

COUNT 1

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6), 924(a)(2), and 2)

The Grand Jury charges:

1. On or about May 29, 2024, in the Northern District of Ohio, Eastern Division, defendants, HEATH TURNER and CASANDRA RELIK, in connection with the acquisition of a firearm, specifically a Rock Island Armory, Model 1911, .45 caliber, Pistol, bearing a serial number of RIA2782575, from the Parma Gun Shop, located at located at 5907 State Road, Parma, Ohio 44134, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to the Parma Gun Shop, which statement was intended and likely to deceive the Parma Gun Shop, as to a fact material to the lawfulness of such sale of the said firearm to RELIK under Chapter 44 of Title 18, in that RELIK represented that she was the actual transferee/buyer of the firearm when, in fact, RELIK attempted to purchase the firearm for TURNER; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 2

(Felon in Possession of a Firearm and Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

2. On or about June 5, 2024 in the Northern District of Ohio, Eastern Division, Defendant HEATH TURNER knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that being: Aggravated Burglary, Kidnapping, Aggravated Robbery, and Felonious Assault, on or about September 22, 2015, in case number CR-14-586796-B, in the Cuyahoga County Court of Common Pleas, did knowingly possess firearms and ammunition, specifically the following firearms:

Manufacturer	Model	Caliber / Type	Serial Number
Del-Ton	DTI-15	.556 Caliber, Rifle	DTI-S263188
Mossberg	590 Shockwave	12 Gauge, Shotgun	V1825176
Ruger	LCP	.380 Caliber, Pistol	379005169
Ruger	10/22,	.22 Caliber, Rifle	0023-22463
SCCY	CPX-1	9mm Caliber, Pistol	C233640
Smith and Wesson	SD40VE	.40 Caliber, Pistol	FBZ1466
Smith and Wesson	SD40VE	.40 Caliber, Pistol	FED0010
Taurus	1911	.45 Caliber, Pistol	ADL917515
Taurus	G3C	9mm Caliber, Pistol	ADH564992

said firearms and ammunition having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

Count 3

(Felon in Possession of a Firearm and Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

3. On or about June 10, 2024 in the Northern District of Ohio, Eastern Division, Defendant ANTWON HOLT knowing that he had been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Manufacture, Delivery, or Possession with Intent To Deliver a Controlled Substance, on or about December 12, 2011, in case number CP-02-CR-0010609-2011, in the Court of Common Pleas of Allegheny County, Pennsylvania;

and Endangering the Welfare of Children and Simple Assault, on or about February 25, 2016, in case number CP-02-CR-0012777-2015, in the Court of Common Pleas of Allegheny County, Pennsylvania, did knowingly possess firearms and ammunition, that is, a Ruger Model AR-556, 350 Legend Caliber, bearing a serial number of 857-17208, and a Glock Model 19, 9mm, semi-automatic pistol, bearing a serial number of AFDU744, said firearms and ammunition having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

Count 4

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

4. On or about March 30, 2024, in the Northern District of Ohio, Eastern Division, defendant, CASANDRA RELIK, in connection with the acquisition of a firearm, specifically a Glock, Model 23, .40 S&W, Pistol, bearing serial number CBVX672, from Fin Feather Fur Outfitters, located at 18030 Bagley Road, Middleburg Heights, Ohio 44130, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Fin Feather Fur Outfitters, which statement was intended and likely to deceive Fin Feather Fur Outfitters, as to a fact material to the lawfulness of such sale of the said firearms to RELIK under Chapter 44 of Title 18, in that RELIK represented that she was the actual transferee/buyer of the firearm when, in fact, RELIK purchased the firearm for another person; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Count 5

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

5. On or about April 26, 2024, in the Northern District of Ohio, Eastern Division, defendant, CASANDRA RELIK, in connection with the acquisition of a firearm, specifically a

Taurus, G3C, 9mm, Pistol, bearing serial number IKA49096, from On Target Firearms, located at 5907 State Road, Parma, Ohio 44134, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to On Target Firearms, which statement was intended and likely to deceive On Target Firearms, as to a fact material to the lawfulness of such sale of the said firearms to RELIK under Chapter 44 of Title 18, in that RELIK represented that she was the actual transferee/buyer of the firearm when, in fact, RELIK purchased the firearm for another person; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Count 6

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

6. On or about May 5, 2024, in the Northern District of Ohio, Eastern Division, defendant, CASANDRA RELIK, in connection with the acquisition of a firearm, specifically a Ruger, Security-9, 9mm, Pistol, bearing the serial number 385-82311, from Fin Feather Fur Outfitters, located at 18030 Bagley Road, Middleburg Heights, Ohio 44130, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Fin Feather Fur Outfitters, which statement was intended and likely to deceive Fin Feather Fur Outfitters, as to a fact material to the lawfulness of such sale of the said firearms to RELIK under Chapter 44 of Title 18, in that RELIK represented that she was the actual transferee/buyer of the firearm when, in fact, RELIK purchased the firearm for another person; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Count 7

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6), 924(a)(2), and 2)

The Grand Jury further charges:

7. On or about October 6, 2023, in the Northern District of Ohio, Eastern Division, defendants, HEATH TURNER and KRISTY STANDEN, in connection with the acquisition of two firearms, specifically a Mossberg & Sons, 590 Shockwave 12 GA Shotgun, bearing serial number V1825176, and a Canik METE SFT 9mm Pistol, bearing serial number 23CC12831, from Sporting Defense, located at 4106 State Route 43, Kent, Ohio 44240, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Sporting Defense, which statement was intended and likely to deceive Sporting Defense, as to a fact material to the lawfulness of such sale of the said firearms to STANDEN under Chapter 44 of Title 18, in that STANDEN represented that she was the actual transferee/buyer of the firearms when, in fact, STANDEN purchased the firearms for TURNER; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Count 8

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6), 924(a)(2), and 2)

The Grand Jury further charges:

8. On or about November 30, 2023, in the Northern District of Ohio, Eastern Division, defendants, HEATH TURNER and KRISTY STANDEN, in connection with the acquisition of two firearms, specifically a Smith and Wesson, Model SD40VE, .40 Caliber, Pistol, bearing the serial number FED0010, and a Kel-Tec CNC, Inc., Sub 2000 9x19 Rifle, bearing the serial number FHG 819, from Stonewall Tactical, located at 100 Ken Mar Industrial Parkway, Broadview Heights, Ohio 44147, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Stonewall Tactical, which statement was intended and likely to deceive Stonewall Tactical, as

to a fact material to the lawfulness of such sale of the said firearms to STANDEN under Chapter 44 of Title 18, in that STANDEN represented that she was the actual transferee/buyer of the firearms when, in fact, STANDEN purchased the firearms for TURNER; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE

The Grand Jury further charges:

9. For the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), the allegations of Counts 1 through 8, inclusive, are incorporated herein by reference. As a result of the foregoing offenses, Defendants HEATH TURNER, CASANDRA RELIK, ANTWON HOLT, and KRISTY STANDEN shall forfeit to the United States all firearms and ammunition involved in or used in the commission of such violations; including, but not limited to, the following:

- A. Rock Island Armory, Model 1911, .45 caliber Pistol, SN: RIA2782575 [HEATH TURNER and CASANDRA RELIK];
- B. Del-Ton DTI, 15.556 Caliber Rifle DTI, SN: S263188 [HEATH TURNER];
- C. Mossberg 590 Schockwave, 12 Guage Shotgun, SN: V1825176 [HEATH TURNER];
- D. Ruger LCP, .380 Caliber Pistol, SN: 379005169 [HEATH TURNER];
- E. Ruger 10/22, .22 Caliber Rifle, SN: 0023-22463 [HEATH TURNER];
- F. SCCY CPX-1, 9mm Caliber pistol, SN: C233640 [HEATH TURNER];
- G. Smith and Wesson SD40VE, .40 Caliber Pistol, SN: FBZ1466 [HEATH TURNER];

H. Smith and Wesson SD40VE, .40 Caliber Pistol, SN: FED0010 [HEATH TURNER];

I. Taurus 1911, .45 Caliber Pistol, SN: ADL917515 [HEATH TURNER];

J. Taurus G3C, 9mm Caliber Pistol, SN: ADH564992 [HEATH TURNER];

K. Ruger Model AR-556, 350 Legend Caliber, SN: 857-17208 [ANTWON HOLT];

L. Glock Model 19, 9mm, semi-automatic pistol, SN: AFDU744 [ANTWON HOLT];

M. Glock, Model 23, .40 S&W, Pistol, SN: CBVX672 [CASANDRA RELIK];

N. Taurus, G3C, 9mm, Pistol, SN: IKA49096 [CASANDRA RELIK];

O. Ruger, Security-9, 9mm, Pistol, SN: 385-82311 [CASANDRA RELIK];

P. Mossberg & Sons, 590 Shockwave 12 GA Shotgun, SN: V1825176 [HEATH TURNER and KRISTY STANDEN];

Q. Canik METE SFT 9mm Pistol, SN: 23CC12831 [HEATH TURNER and KRISTY STANDEN];

R. Smith and Wesson, Model SD40VE, .40 Caliber, Pistol, SN: FED0010 [HEATH TURNER and KRISTY STANDEN]; and

S. Kel-Tec CNC, Inc., Sub 2000 9x19 Rifle, SN: FHG 819 [HEATH TURNER and KRISTY STANDEN].

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.